

October 14, 2010

U.S. Department of Education 400 Maryland Avenue, SW. LBJ Washington, DC 20202-4537

RE: Notice of Proposed Information Collection Request, Study of Teacher Residency Programs

Urban Teacher Residency United (UTRU) is looking forward to the Department's study of Teacher Residency Programs. As a not-for-profit organization that serves a growing national network of innovative teacher preparation programs we think it is vital to study the impact of teachers who participate in teacher residency programs both on student achievement and on their retention rates. Founded in 2007, UTRU works closely with school districts, not-for-profit organizations and universities to build and manage a national network of high-performing urban teacher residencies dedicated to accelerating student achievement.

We provide the following comments in response to the Department's request for how to enhance the quality, utility and clarity of the information to be collected. In order to enhance the quality of the information collected and of the resulting study, we believe it is imperative to focus on the standards associated with the studied residencies. UTRU has developed standards, which identify, define, and describe the specific program design elements that are essential for quality urban teacher residencies (UTR). These quality standards act as the foundation for the network's programmatic and learning activities. UTRU utilizes these standards to support individual program development as well as a dynamic professional learning community in which best practices are developed and disseminated.

The focus on standards is particularly important given the study's focus on both TQP residencies and non-TQP residencies. There can be a significant difference and a clear understanding of both what is required and the standards associated with each is paramount to the quality of the information collected.

The standards identify 6 core elements of residency programs and a set of related standards that define what quality looks like within each element. Additionally, for each standard within each element, UTRU has developed a set of model indicators with

corresponding rubrics detailing quality at three levels (emerging, applying, and integrating). The quality descriptors within the three levels are meant to be cumulative, such that "emerging" integrates and expands upon what is described in "applying" and so on. The standards and corresponding quality rubrics are meant to be an assessment and program development tool for both emerging and established residency programs. A copy of UTRU's standards is included as an addendum to these comments.

With respect to the quality, utility and clarity of the information to be collected for this specific study we would highlight a couple of key areas which are necessary to a quality residency. First is the level and use of coursework. In order to be most effective the clinical experience and the coursework must be fully integrated. The alignment and integration of the coursework is central to a residency and should be explicitly represented in any study of such programs.

Second is what level of responsibility for planning and lesson delivery does the resident assume as he or she progresses through the residency. A critical component of the residency year is that the resident takes an increasing share of this responsibility, which is most often reflected in time instead of days. To ensure clarity of the information collected how this transition happens and over what time period should be contemplated.

Third, since one of the primary goals of this study is to look at the retention rates of teachers in residency programs, the information collected should identify what level of commitment is required to the school district and profession. UTRU and Teacher Quality Partnership grantees all require teachers to remain in the profession with the school district for at least 3 years. The information collected should include this information for each participating residency program.

Fourth, it is important to have a clear understanding of the matching requirements of residents to mentors. The number of residents assigned to each mentor varies across quality programs. Information collected should not assume a one-to-one assignment and should clearly articulate the ratios associated with each residency.

Finally, when comparing teachers in a residency program to teachers who are not in a residency program, the utility of this information suffers if they are not evenly matched. The study suggests that a residency teacher may be matched to a teacher in his or her first, second or even third year of teaching. This arguably limits the comparability.

We believe strongly that the recruitment, preparation, and induction of excellent teachers are a central strategy in improving urban schools, and school reform measures will not succeed unless there is considerable focus on preparing and retaining excellent teachers. As an essential component of a comprehensive human capital strategy and reform efforts, UTRs meet the hiring needs of partnering school districts, provide career advancement for progressive teachers to act as mentors, and focus on developing highly effective teachers with increased student achievement as the critical end result. We welcome a study and reiterate the importance of a focus on quality programs.

We sincerely appreciate your time and attention to our comments.

Sincerely,

/s/

Tamara Azar Policy Director Urban Teacher Residency United